

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	CRIMINAL NO. 4:22-CR-612
	§	
TOM COOPERMAN	§	
	§	

NOTICE OF JOINDER OF EXPERT DESIGNATION

TO THE HONORABLE JUDGE ANDREW S. HANEN:

COMES NOW, Tom Cooperman joining and supplementing Defendant Matlock's Designation of Expert – Colin Marks.

As referenced in Mr. Cooperman's Joinder of the Motion to Continue Scheduling Order, Undersigned Counsel's trial docket for the balance of this calendar year remains overbearing. Having concluded the latest of back-to-back trials late last week¹, Undersigned Counsel has not yet completed the necessary analysis of on-going discovery nor even reviewed the Government's voluminous exhibit list.² Therefore, Mr. Cooperman renews his request for a new scheduling order. In the alternative, Mr. Cooperman formally seeks leave of Court to supplement this expert designation as may be necessary once discovery is complete and properly analyzed in keeping with Mr. Cooperman's right to effective assistance of counsel.

¹ See Exhibit A – Judgment of Acquittal from *State v. Edgar Morton*.

² The Government notified Counsel of additional discovery on August 8, 2023 – Government Production # 19. The Government's Exhibit List contains almost 700 files.

Respectfully Submitted,

/s/ Chip Lewis
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Joinder has been forward via electronic mail to the Government on this the 15th day of August 2023.

/s/ Chip Lewis
CHIP LEWIS